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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

JUL 29 1991

DATE: Request for Completion of Consent Order, Docket No. V-W-90-C-051,  
SUBJECT: Albion-Sheridan Township Landfill Site, Albion, Calhoun County, Michigan  
(Site ID #AN)  
FROM: Jason El-Zein, On-Scene Coordinator *Robert Buckley for JEZ*  
Emergency and Enforcement Response Branch - Section I  
TO: File



PURPOSE

The purpose of this memorandum is to certify compliance with terms of the Unilateral Administrative Order, Docket No. V-W-90-C-051, Albion-Sheridan Township Landfill site, Albion, Calhoun County, Michigan.

BACKGROUND

The AST Landfill is a closed and abandoned 30-acre landfill that operated from 1966 to 1981. The landfill is located at 13355 29 Mile Road, one mile east of Albion, Calhoun County, Michigan. An estimated 13,500 persons obtain their drinking water from public and private wells within a three-mile radius of the site. Also, the Kalamazoo River is located approximately 1,200 feet south of the landfill.

Site history indicates that the AST landfill accepted municipal refuse as well as industrial waste such as heavy metal sludge, paint residues, and spent solvents.

A pre-remedial site investigation performed by the U.S. Environmental Protection Agency (U.S. EPA) Field Investigation Team (FIT) in March 1986 indicated that the landfill accepted approximately 2,000 cubic yards of heavy metal sludge and 35,000 drums of paint wastes and spent solvents during its operation. As a result of this investigation, the AST landfill site was placed on the NPL.

At the request of the U.S. EPA Emergency and Enforcement Response Branch (EERB) Staff, the Region V Technical Assistance Team (TAT) conducted a site inspection on August 15, 1989. During the inspection, the TAT confirmed the presence of numerous drums and containers of what appeared to be grease and paint waste. However, analysis of samples collected from two different drums indicated that the materials did not exhibit any characteristics of RCRA hazardous waste per 40 CFR parts 261.20-261.24. These samples were not analyzed for RCRA "listed" wastes.

On October 5, 1989, the U.S. EPA requested TAT to return to the AST landfill site to collect and analyze samples from drums not previously sampled on the last inspection. Analysis of samples collected on October 13, 1989, confirmed the presence of abandoned RCRA waste (ignitability characteristic - flash point less than 75°F). A solvent scan was also performed on one sample. A total of five volatile organic

compounds (VOCs) were detected in the sample: ethylbenzene, toluene, tetrachloroethylene, 1,1,1-trichloroethane, and xylene. The presence of these constituents identifies this materials as an EPA F-listed (F001 - F005) hazardous waste or as being sufficiently similar to a F-listed waste to warrant treatment/disposal.

There is a locked gate on the southeastern corner of the site preventing access to the north/south road, however, the rest of the site is accessible to unsuspecting members of the public and to young children.

Negotiation between the U.S. EPA and PRPs resulted in an agreement with Eagle-Picher Industries, Inc., and Seiler Tank Truck Services, Inc., to undertake mitigation actions for the surface removal of hazardous wastes.

#### THREAT

The facility presented an imminent and substantial threat to human health and welfare and the environment from direct contact with hazardous substances, from release or threat of release of hazardous substances, and from threat of fire or explosion.

#### COMPLIANCE WITH ORDER

The respondents contacted Great Lakes Environmental Services, Inc., to perform the following tasks:

- 1) Develop and implement site safety and health plan.
- 2) Implement an air monitoring program.
- 3) Identify, stage, and sample all containers of characteristic and listed RCRA wastes and CERCLA hazardous substances.
- 4) Package, transport and dispose of all surface wastes and their respective containers at secure off-site disposal facilities.

Task 1 - The site safety and health plan was approved by OSC after minor revisions were made.

Task 2 - Air monitoring program was approved by OSC and then implemented by PRP's contractor upon the start and throughout the removal project duration.

Task 3 - Contractor staged, sampled and overpacked eighteen 55-gallon drums and 2 small containers. Twenty RCRA empty drums were taken to a contractor facility and then crushed. Two 500-gallon underground storage tanks (UST) and one 8,000-gallon aboveground storage tank were found on site. One UST contained 20 gallons of liquid that was transferred to a 55-gallon drum. The remaining tanks were completely empty. The USTs were decontaminated and decon solution was collected and

then added to the drum containing the 20 gallons of liquid. The 8,000-gallon tank was cut open and left on site. The sampling of the drums was completed without delay.

- Task 4 - Difficulties were encountered in finding facilities to accept the waste; however, all drums were sent to the ENSCO facility in Eldorado, Arkansas, for incineration upon acceptance. The RCRA empty drums were shipped to Wayne Disposal facility for landfill.

The respondents also installed an 8 foot chain link fence on the south and north sides of the site, and hazardous substances warning signs were placed on the fence and the row of trees on the east and west sides of the site. The fence line along the south side of the site was delayed because the property owner of the south portion of the site requested no fence be installed at this location. Subsequent negotiation between the U.S. EPA and the property owner resulted in the owner granting permission to install a fence.

The project was not completed in the time period specified in the Order; however, the reasons for non-compliance with the timeframe were legitimate and beyond the control of the respondent. The delays were related to finding disposal facilities and negotiation with the owner of the south side portion of the site.

#### CONCLUSION

On September 14, 1990, OSC, site attorney, TAT and MDNR conducted a site walk through and determined that work had been performed in accordance with the agreed-upon work plan.

cc: Beth Henning, ORC, 5CS-TUB-3  
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EERB Site File  
EERB Read File